

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

Defendants.

**Case No. 1:24-cv-05625**

**Honorable Judge John Robert Blakey  
Magistrate Judge Heather K. McShain**

HEARING DATE: February 12, 2025

HEARING TIME: 11:00 AM CST

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on Wednesday, February 12, 2025, at 11:00 AM CST, Defendants Suntopdirect and Topbright (“Defendants”) in the above captioned action, by their counsel shall appear telephonically, if permitted, before the Honorable John Robert Blakely to present its Motion to Enforce Settlement between Defendants and Plaintiff Fujian Mingta Toys Co. Ltd. [Dkt. 40] and Motion to File Under Seal [Dkt. No. 41].

DATED: January 31, 2025

Respectfully submitted,

By: /s/ William R. Brees

William R. Brees (Florida Bar No. 98886)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ William R. Brees  
William R. Brees (Florida Bar No. 98886)  
**BAYRAMOGLU LAW OFFICES LLC**